

Date: 26 March 2021

Document:

- General questions
- Which pure British standard should be developed
- Scope slide 11

Project: Revision of Furniture & Furnishing (Fire) (Safety) Regulations
FW/6_21_0010

Template for comments and secretariat observations

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments Suggested title of your proposed standard:	Proposed change Suggested scope of your proposed standard:	Observations of the secretariat
TH NBF					<p>General question:</p> <p><u>Challenge – How will the Regulations be enforced</u></p> <p>If compliance can be done by risk assessment and not necessarily testing (as BS standards would be voluntary status) how will this be managed by Trading Standards Officers?</p> <p>What about imports – other countries may not know / want to use our national standards.</p>	BEIS OPSS to advise	
TH NBF					<p>General question:</p> <p><u>Challenge – Electrically operated furniture covered by the Machinery Directive</u></p> <p>How will these products be managed? Will they have to comply with domestic FFFSR Regulations in addition to the Machinery Directive? What about imports to UK?</p>	BEIS OPSS to advise	
JM AUE /7 And W-S- B AMU SF					<p>Suggestion 1:</p> <p>If baby products MUST be included in this new approach, a safety standard specific to these products should be developed that does not try to 'lump' them in with large articles of upholstered furniture such as a sofa.</p> <p>Flammability of baby and nursery products for domestic indoor use</p>	<p>Suggestion 1 proposed wording:</p> <p>This British Standard specifies the flammability requirements and test methods of upholstered products intended to contain a baby or young child for domestic indoor use</p>	

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TH NBF					<p>Suggestion 2:</p> <p>Different products can be dealt with in different ways. It is difficult to test large items such as sofas that have different materials in different areas as a total item finished product.</p> <p>It is generally felt that component testing is the most practical way to test / ensure compliance.</p> <p>However, it is possible to deal with other items either as a finished product or by small scale sample testing that represents the finished product such as headboards, mattresses, bed bases etc. as BS 7177 is currently working in this way.</p>	<p>Suggestion 2 proposed wording:</p> <p>A suite of standards that cover different product types:-</p> <p>Part 1 – Domestic Upholstered Furniture – Sofas, Chairs etc... (could be component testing using production materials?)</p> <p>Part 2 – Domestic Upholstered Furniture – Beds, Mattresses and Headboards (based on BS 7177 & BS 7176)</p> <p>Part 3 – Domestic Upholstered Furniture – Baby Products (if these continue to be listed as in scope of the Regulations)</p> <p>Part 4 – Domestic Upholstered Furniture – Filling materials - Foam</p>	
SM BFM					<p>Suggestion 3:</p> <p>Suggested title of your proposed standard: ‘UK Domestic Upholstered Furniture Flammability Regulations’</p>	<p>Suggestion 3 proposed wording:</p> <p>Suggested scope of your proposed standard: <i>‘any item of domestic furniture which is ordinarily intended for private use in a dwelling and comprises a cover fabric(s) or cover material(s) and a filling(s)’</i></p>	

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PJW FRE TW ORK					<p>Suggestion 4: Test Methods. It was a failing in the original FFR that consideration of exactly where the tests would be applied was badly thought out, although a different approach to process control existed in any case.</p> <p>It has always been a problem that manufacture will have difficulties with tests that take time and the appearance of the soak test in the FFR rather than the standards has meant that the definition of compliance begins with the soak test. This totally fails a requirement to test materials in manufacture that is compatible with process control of variable materials and is compounded by the lack of any description of the risk it was designed to address.</p> <p>The best safety is provided when testing can be quick and simple. This does not avoid the existing need for external control of the process control system by audit and test. It goes without saying that we should test what is sold/used and the soak test fails that criterion.</p> <p>For this reason, Final Article testing without some underlying control over processes will never be acceptable to industry.</p>	<p>Suggestion 4 proposed wording: Testing must be designed to meet industry's requirements to best manage achieving safety and maintaining it through varied production scenarios – textiles especially.</p>	

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PJW FRE TW ORK					<p>Suggestion 5: Test Methods. The existing FFR has a testing regime that has serious problems with their suitability for different sectors of the Supply Chain. Testing may be described in different scenarios or as categories: FORENSIC: Suitable when no verifiable source information is available or to establish a very precise record of performance. PROCESS CONTROL: It is important that raw materials and production is capable of being tested within a suitable time frame. TRACEABILITY RECORDS: The new basis for to replace the present FFR must be suited to monitoring of both product, systems and recording. DEVELOPMENT: This document makes clear that new and novel approaches must be sought to meet the objectives and the ESRs. The testing regime must be adaptable to assessing different materials so that the basic Risks are assessed effectively and efficiently as an aid to development.</p>		

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KK CIA					<p>Suggestion 6:</p> <p>Suggested title of your proposed standard:</p> <p>The current Furniture and Furnishings (Fire) (Safety) Regulations 1988 already comprehensively deal with the fire safety of furniture. In light of the BEIS/OPSS proposals, a revision of the above Regulations along with the revision of the BS 5852:2006 standard as a tool to substantiate the new ESR proposals is essential.</p> <p>Taking into account these substantial revisions, we believe that the introduction of a new pure British standard is superfluous.</p>	<p>Suggested scope of your proposed standard:</p>	
WS- B AMU SF		Table 11	Scope		<p>Problem 1:</p> <p>There is no reference to either second-hand re-upholstered furniture nor the use of loose covers on upholstered furniture.</p>	<p>Problem 1 solution:</p> <p>Include re-upholstery, second-hand upholstered furniture and loose covers in the list of exclusions in the policy.</p>	

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